

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 13-CR-
	:	
	:	
	:	
v.	:	VIOLATIONS:
	:	
	:	18 U.S.C. § 1001
	:	(Making a False Statement)
VERNON HAWKINS,	:	
	:	
Defendant.	:	

INFORMATION

The United States Attorney charges:

At all times material to this Information:

Individuals and Entities

1. Beginning in the spring of 2010, and continuing through the 2010 general election, CANDIDATE A, a resident of the District of Columbia, was a candidate for Mayor of the District of Columbia.

2. Beginning in the spring of 2010, and continuing through the 2010 general election, defendant VERNON HAWKINS ("HAWKINS"), a resident of the District of Columbia, was a volunteer advisor for the CANDIDATE A for Mayor campaign (hereinafter, "CAMPAIGN A"). HAWKINS provided advice to the candidate and other members of the campaign on matters such as field operations, staffing, and communications. HAWKINS previously had served as a paid consultant and community outreach worker for CANDIDATE A's 2004 campaign for Ward 7 Council Member and as a volunteer advisor for CANDIDATE A's 2006 campaign for Chairman of the Council of the District of Columbia ("D.C. Council").

3. EXECUTIVE A, a resident of the District of Columbia, was a named partner, Chairman and Chief Executive Officer, and the majority owner of COMPANY A. EXECUTIVE A worked at COMPANY A's main office in the District of Columbia.

4. EUGENIA C. HARRIS ("HARRIS"), a resident of the District of Columbia, owned and controlled two for-profit corporations registered in the District of Columbia: Belle International, Inc. ("BELLE") and Details International, Inc. ("DETAILS").

5. Beginning in the summer of 2010, and continuing through the 2010 primary election, PERSON ONE, a resident of the District of Columbia and the owner of a catering business in the District of Columbia, was the transportation coordinator for the EXECUTIVE A-funded Get Out the Vote ("GOTV") effort in support of CAMPAIGN A.

6. The Federal Bureau of Investigation ("FBI") was an agency within the executive branch of the federal government, headquartered in Washington, D.C. Among the FBI's top investigative priorities was public corruption, including election crimes and local corruption.

COUNT ONE
(Making a False Statement)

7. The allegations in paragraphs 1 through 6 of this Information are alleged and incorporated by reference herein.


8. On or about August 16, 2012, in the District of Columbia and elsewhere, HAWKINS, in a matter within the jurisdiction of the executive branch of the government of the United States, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation, in that HAWKINS made the following statements, among others, to FBI special agents:

- a) That he did not know of anyone asked or told to go out of town who had been involved with CAMPAIGN A or the EXECUTIVE A-funded GOTV effort in support of CAMPAIGN A;
- b) That he never requested for anyone to leave town so that they could not come to the U.S. Attorney's Office or speak with federal agents; and
- c) That he did not help or assist with sending anyone out of town so they would not be able to speak with federal agents in the FBI's investigation of the EXECUTIVE A-funded GOTV effort in support of CAMPAIGN A;

when, in truth and in fact, in or about December 2011, HAWKINS gave PERSON ONE funds that HAWKINS received from HARRIS in order to persuade PERSON ONE to leave town for an extended period of time, so that PERSON ONE would be unavailable to speak with federal agents in the FBI's investigation of the EXECUTIVE A-funded GOTV effort in support of CAMPAIGN A.

(Making a False Statement in Violation of Title 18, United States Code, Section 1001)

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